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GOOGLE INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,
16 Plaintiffs,
17 v.
18 GOOGLE INC.,
19 Defendant.

Case No. 3:10-cv-03561 WHA

**DECLARATION OF REID P. MULLEN IN
SUPPORT OF ORACLE'S
ADMINISTRATIVE MOTION TO SEAL
MANUALLY FILED DOCUMENT**

Judge: Hon. Donna M. Ryu

Date Filed: August 12, 2010

Trial Date: May 9, 2016

1 I, Reid P. Mullen, declare as follows:

2 1. I am an associate in the law firm of Keker & Van Nest LLP, counsel to Google
3 Inc. ("Google") in the present case. In accordance with Local Rule 79-5(d)(1)(A), I submit this
4 declaration in support of Oracle's Administrative Motion to Seal Manually Filed Document. Dkt.
5 No. 1389. I have knowledge of the facts set forth herein, and if called to testify as a witness
6 thereto could do so competently under oath.

7 2. The Exhibit to the Joint Letter Regarding Oracle's Motion to Compel Production
8 of Documents Improperly Withheld by Google as Privileged, manually filed on November 24,
9 2015, is an excerpt of Google's privilege log for this case, which Google designated "HIGHLY
10 CONFIDENTIAL – ATTORNEY'S EYES ONLY." Under the Protective Order, Oracle was
11 obligated to file the Exhibit under seal because Google's privilege log contains confidential
12 information regarding the date and general subject matter of privileged communications between
13 Google and its counsel. Google considers the timing, frequency, and subject matter of its
14 communications with its counsel to be highly confidential information. Under no circumstances
15 does Google disclose any such information to the public during the normal course of business, or
16 absent a direct court order. Public disclosure of facts underlying Google's communications with
17 its counsel would cause significant and undue harm to Google's business. This Exhibit should
18 therefore be filed under seal.

19 I declare under penalty of perjury that the foregoing is true and correct and that this
20 declaration was executed at San Francisco, California on November 30, 2015.

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22 By: /s/ Reid P. Mullen
23 REID P. MULLEN
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